

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

CITY OF GRAND RAPIDS,
Plaintiff/Counter-Defendant,

Case No. 1:17-cv-00113

vs.

Hon. Paul L. Maloney

**GRAND RAPIDS POLICE COMMAND
OFFICERS ASSOCIATION, MATTHEW
JANISKEE, KRISTE KIBBEY ETUE-
MICHIGAN STATE POLICE, and
JEFFREY GETTING-KALAMAZOO
COUNTY PROSECUTOR**
Defendants.

**CERTIFICATE REGARDING
MOTION CONCURRENCE**

and

MATTHEW JANISKEE, and all those
similarly situated,
Counter-Plaintiff/Cross-Plaintiff/Third-
Party Plaintiff,

vs.

CITY OF GRAND RAPIDS,
Counter-Defendant,

**KRISTE KIBBEY ETUE-MICHIGAN
STATE POLICE and JEFFREY
GETTING-KALAMAZOO COUNTY
PROSECUTOR,**
Cross-Defendants,

**DAVID RAHINSKI, DANIEL SAVAGE,
DAVID KIDDLE, PETER McWATERS,
and DAVID SCHNURSTEIN,**
Third-Party Defendants.

CERTIFICATE REGARDING MOTION CONCURRENCE

Pursuant to Local Rule 7.1(d), the undersigned counsel for Defendant/Counter-Plaintiff/Cross-Plaintiff/Third-Party Plaintiff Matthew Janiskee contacted counsel for the City of Grand Rapids, the Grand Rapids Police Command Officers Association, Kristie Kibbe Eute, Jeffrey Getting, David Rahinski, Daniel Savage, David Kiddle, Peter McWatters, and David Schnurstein to seek concurrence regarding the relief sought in Matthew Janiskee's Motion to Allow Time for Discovery Under Rule 56(d).

Counsel for Grand Rapids Police Command Officers Association indicated concurrence with the relief sought in Matthew Janiskee's Motion. Counsel for the City of Grand Rapids, Jeffrey Getting, David Rahinski, Daniel Savage, and David Kiddle indicated that they did not concur with the relief sought in Matthew Janiskee's Motion.

As of the date and time of filing this Motion, Kristie Kibbe Etue, Peter McWatters, and David Schnurstein have not yet indicated whether they concur. It is believed that these parties are likely to not concur with the relief sought in Matthew Janiskee's Motion.

Respectfully submitted,

RODENHOUSE KUIPERS, P.C.

Date: July 13, 2017

/s/ C. Christopher Newberg_____
C. Christopher Newberg (P79025)
Andrew J. Rodenhouse (P73342)
Attorneys for Mathew Janiskee
678 Front Ave., NW, Suite 176
Grand Rapids, MI 49504
PH: (616) 451-4000
Fax:(616) 451-4114
Email: Andrew@rodenhouselaw.com
Email: Chris@rodenhouselaw.com